

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

KEDDRICK BROWN, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

PROGRESSIVE MOUNTAIN
INSURANCE COMPANY,

Defendant.

Consolidated Case No.:
3:21-cv-00175-TCB

MICHELLE BOST, individually and
on behalf of all others similarly
situated,

Plaintiff,

v.

PROGRESSIVE PREMIER
INSURANCE COMPANY OF
ILLINOIS,

Defendants.

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs, Keddrick Brown and Michelle Bost, hereby move this Court for an order (1) preliminarily approving the Settlement, (2) provisionally certifying the Settlement Classes, (3) appointing Plaintiffs Michelle Bost and Keddrick Brown as Settlement Class Representatives, (4) appointing Carney Bates & Pulliam, PLLC, Jacobson Phillips PLLC, Normand PLLC, Edelsberg Law, P.A., Shamis & Gentile, and Bailey Glasser LLP as Class Counsel for the Settlement Classes, (5) approving Epiq Class Action and Claims Solutions, Inc. as Settlement Administrator, (6) approving the form and manner of Class Notice to the Settlement Classes, (7) approving the proposed schedule of events, and (8) scheduling a Final Fairness Hearing.

For the reasons set forth in the accompanying Memorandum of Law (Exhibit 1), Declaration of Hank Bates in Support of Motion for Preliminary Approval filed contemporaneously herewith, and Declaration of Cameron R. Azari, Esq. on Settlement Notice Plan (Exhibit 2), this Court should enter an Order granting preliminary approving the Settlement Classes. A proposed Order Granting Preliminary Approval is attached hereto as Exhibit 3.

Respectfully submitted this 14th day of February, 2025.

/s/ Jake Phillips
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CERTIFICATE OF SERVICE

I, Jacob L. Phillips, hereby certify that on this 14th day of February, 2025, I electronically filed the foregoing via the Court's CM/ECF system, which will provide electronic notification to all counsel of record.

/s/Jake Phillips
Attorney for Plaintiffs